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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Final Monthly Report - RCRA/Superfund Industry Assistance Hotline
Report for June 1987

FROM: *Joan Warren*
Joan Warren, WH-562
Office of Solid Waste

H. Watters
Hubert Watters, Office of Emergency
and Remedial Response (WH-548B)

TO: See list of addressees

This report is prepared and submitted for EPA contract No. 68-01-7371.

I. ACTIVITIES

- A. The Hotline responded to 11,043 questions and requests for documents in June.
- B. On June 5, Hotline staff attended the public hearing on the May 6, 1987 proposed technical standards for boilers and industrial furnaces used to burn hazardous waste for energy recovery.
- C. On June 9, Robyn Neaville attended a Title III workgroup meeting.
- D. On June 11, Walt DeRieux (OSW) briefed the Hotline on the May 29, 1987 proposed rules requiring leak detection systems for hazardous waste land units.
- E. On June 12, Caroline Danek attended a National Contingency Plan (NCP) workgroup meeting.
- F. On June 16, Denise Sines briefed Henry Longest and OERR staff regarding the Hotline operations.
- G. On June 25, Doug Bice and Dave Phillips attended the Title III teleconference.
- H. On June 26, Laurie Huber and Joe Nixon joined the UST office on a site tour of the Buffalo Tank Manufacturing Company in Baltimore, MD.
- I. On June 30, Laurie Huber and Joe Nixon attended a briefing on tank piping presented by Marcell Moreau (formerly with the State of Maine) for the Office of Underground Storage Tanks.

II. SIGNIFICANT QUESTIONS AND RESOLVED ISSUES

A. RCRA PROGRAM

1. Waste Minimization Requirements

What is the basis for waste minimization and what is required?

In the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) (Section 3002), Congress stated that as a matter of national policy, the generation of hazardous waste should be reduced or eliminated as expeditiously as possible. Waste that is nevertheless generated should be treated, stored or disposed of so as to minimize the present and future threat to human health and the environment.

HSWA required that generators of a hazardous waste submit a biennial report to the Regional Administrator which would include: 1) efforts undertaken during the year to reduce the volume and toxicity of waste generated, and 2) the changes in volume and toxicity of waste actually achieved during the year in comparison with previous years (Section 3002(a)(6)(A-C). Effective September 1, 1985, generators had to use a manifest containing a certification by the generator that he had a program in place to reduce the volume or quantity and toxicity of hazardous waste to the degree determined by the generator to be economically practicable. The program must include a practicable method currently available to the generator which minimize the present and future threat to human health and the environment. Also effective September 1, 1985, any permit issued under Section 3004 of the Solid Waste Disposal Act for the treatment, storage or disposal of hazardous waste must require that the permittee certify no less often than annually that he has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the permittee to be economically practicable. The permittee's proposed method of treatment, storage or disposal must include a practicable method currently available to him which minimizes the present and future threat to human health and the environment.

The term "waste minimization" has been defined differently by different organizations. The U.S. EPA, in its October 1986 Report to Congress on the minimization of hazardous waste, defined waste minimization as:

"The reduction, to the extent feasible, of hazardous waste that is generated or subsequently treated, stored, or disposed of. It includes any source reduction or recycling activity undertaken by a generator that results in either: (1) the reduction of total volume or quantity of hazardous waste or (2) the reduction of toxicity of hazardous waste, or both, so long as the reduction is consistent with the goal of minimizing present and future threats to human health and the environment. Waste minimization does not include treatment of hazardous waste."

Source: Elaine Eby (202) 475-7237
Research: Carla A. Rellergert

2. EPA Waste Minimization Program Activities

What is EPA currently doing in the area of waste minimization?

For the past two years, the Office of Solid Waste has been actively involved in the area of waste minimization. In a 1986 report to Congress required under Section 8002(r) of RCRA, EPA stated that incentives for waste minimization are strong and growing. Since data was scarce on existing waste minimization programs, EPA stated that it would report back to Congress in 1990 on the need for "command and control" regulations for waste minimization. Under Section 8002(r) Congress had asked EPA to look at desirability and feasibility of "command and control" regulations.

As it is presently structured, the Agency's waste minimization program has two principle objectives: (1) evaluate the need for regulations for waste minimization and present this evaluation along with appropriate recommendations in a report to Congress in 1990, and (2) foster the use of waste minimization through technology transfer and information dissemination activities. In order to achieve these goals, OSW developed its 1987 and 1988 Fiscal Year programs to focus on gathering information and data to determine waste minimization trends and to develop information dissemination and technology transfer activities.

Presently, OSW activities include:

- (1) Revising the requirement for a narrative statement for waste minimization in biennial reports. The current format consists of a "blank page" with instructions to provide a "narrative description" of waste minimization activities. The revised biennial report will consist of yes/no questions which will indicate generators' awareness of waste minimization, specific questions about waste minimization techniques, and volume of toxicity of data.
- (2) Initiating a computerized data and information retrieval system for waste minimization.
- (3) Developing waste minimization policy statements which will be non-binding and reflect EPA's ideas on what does and does not constitute waste minimization.
- (4) Co-Sponsoring two meetings "National Roundtable of State Waste Reduction Programs" and Woods Hole III "Waste Minimization - The Hurdles Ahead".

2. Waste Minimization Program Activities (Continued)

- (5) Developing a waste minimization audit training videotape in conjunction with ORD's development of a manual on how to conduct a waste minimization audit. ORD is also developing case studies on waste minimization.
- (6) Developing several technology transfer procedures which will provide general information on waste minimization, waste exchanges, waste minimization and small quantity generators, good housekeeping and metal parts cleaning.
- (7) Coordinating with the Office of Toxic Substances, to develop a Premanufacturing Notice - Chemical Advisory on waste minimization.
- (8) Coordinating with Superfund offices on SARA provisions relating to waste minimization. This includes the state capacity certification and Section 313 of Title III, the Toxic Chemical Release Inventory.

Source: Elaine Eby (202) 475-7237
Research: Carla A. Rellergert

3. Groundwater Monitoring For Radionuclides

How are radionuclides, which are present in mixed low-level radioactive waste, monitored in the groundwater at an interim status disposal facility?

When the facility is in interim status, the initial background monitoring required by 40 CFR 265.92(b) and (c) consists of monitoring for drinking water parameters specified in §265.92(b)(1)-(3) Appendix III and 265.92(b)(1) references. One of the parameters specified in Appendix III is gross Alpha radiation. The regulations require quarterly monitoring for these constituents for one year. Part 265 does not address the requirement to monitor the groundwater for radiation beyond the original four background measurements.

Source: Burnell Vincent (202) 382-4658
Research: Becky Cuthbertson

4. Clean Closure

Section 265.228(a) of the recently promulgated amendment to the surface impoundment closure and post-closure care rule, published in the Federal Register on March 19, 1987 (52 FR 8704), states that various facility elements (e.g., contaminated subsoils, liners, and structures) must be removed or decontaminated before clean-closure can occur. Contaminated groundwater is not listed among those elements. Must affected groundwater also be removed or decontaminated before clean closure is possible?

In the preamble to the final rule the Agency stated that it interprets the term "contaminated subsoils" to include contaminated groundwater (52 FR 8705). The preamble also states (52 FR 8706) that owners and operators must remove all wastes, liners, and all materials contaminated with waste or leachate (including groundwater) that pose a threat to human health or the environment.

Source: Ossi Meyn (202) 382-7597
Research: Kurt Patrizi

5. Mobile Wastewater Treatment Units

Wastewater treatment units, as defined in 40 CFR 260.10, are excluded from the permitting requirements per §270.1(c)(2)(v). In order for a unit to meet the "wastewater treatment" exclusion, it must meet the three criteria set in §260.10.

- (1) It must be part of a wastewater treatment facility that is subject to §402 or §307(b) of the Clean Water Act;
- (2) It must receive and treat or store a wastewater or wastewater treatment sludge that is a hazardous waste, or generate and accumulate a hazardous wastewater treatment sludge, and
- (3) It must be a tank as defined in §260.10.

Wastewater treatment units, by definition, must be tanks. A tank is defined in §260.10 as "a statutory device, designed to contain an accumulation of hazardous waste which is constructed primarily of non-earthen materials... which provide structural support."

A potential application of mobile treatment unit technology is for a mobile treatment unit to be used for wastewater treatment (e.g., dewatering sludges). Is it possible for a mobile treatment unit to be a tank as defined in §260.10?

5. Mobile Wastewater Treatment Units (Continued)

Yes. A mobile treatment unit could be a tank as defined in §260.10. Although §260.10 defines a tank as "a stationary device", EPA has determined that a mobile tank could be a "tank" provided that it is intended to be stationary when in operation and that it meets the definition of a tank in all other respects (See 52 FR 20919).

In addition, EPA proposed regulations in the June 3, 1987 Federal Register (52 FR 20914) for permitting of mobile treatment units (MTUs) that are subject to RCRA. According to the proposed rule, MTU would obtain a state-wide technical permit and a site specific permit that would allow it to operate. EPA is also requesting comments on the Hazardous Waste Treatment Council's suggestion to exclude certain "low risk" treatment units, such as evaporation or dewatering units, from the permitting process.

Source: Robin Anderson (202) 382-4498
Research: Jennifer B. Planert

6. Solid Waste Classification

An electronics manufacturer uses a wave soldering operation to imprint circuit boards. A "hot tin pot" containing a large mass of molten tin-lead solder is used as the source for the imprinting procedure. Solder from the pot is fed into the wave operation via a gulley or channel, and residual or excess solder is fed directly back into the pot for reuse. The solder becomes contaminated over time with copper and gold from the circuit boards and is no longer usable. The contents of the pot are then solidified in a large block and sent for gold recovery and solder reclamation. Would the block of solder be classified as a spent material, scrap metal, by-product or off specification commercial chemical product?

The contents of the "hot tin pot" would be classified as a spent material. Spent materials, per 50 FR 618, are materials that have been used and are no longer fit for use without being regenerated, reclaimed or otherwise reprocessed. The material would not meet the scrap metal classification because it is not a metal product discarded after consumer use or metal turning or fine. It would also be excluded from the off specification commercial chemical product category due to its prior use.

Source: Steve Silverman (202) 382-7706
Research: Andy O'Hare

7. Liability Requirements of Subsidiaries

EPA requires that all hazardous waste firms comply with the RCRA third party liability requirements. Besides insurance, compliance can be obtained through the use of the financial test for liability and the corporate guarantee for liability. A hazardous waste company has six different subsidiary firms. This parent corporation has met the requirements of the financial test. Can all six subsidiaries obtain a corporate guarantee from the parent corporation?

Nothing in the regulation prevents the parent from using the corporate guarantee for more than one sub-contractor. But, the required multiples for the financial test must be based on a true aggregate of liability guaranteed.

Source: Carlos Lago (202) 382-4780
Research: George Kleevic

III. ANALYSES OF QUESTIONS

Summary of calls by Geographic Distribution (EPA Regions):

1	5.0%	3	25.0%	5	18.0%	7	3.4%	9	11.0%
2	10.5%	4	12.0%	6	10.0%	8	2.6%	10	2.4%
International		0.1%							

Breakdown of Sources of Questions:

Manufacturers	5.6%	State Agencies	4.1%
Generators	19.0%	Consultants	32.0%
Transporters	2.0%	Press	0.6%
TSDF's	8.1%	Trade Associations	1.1%
EPA HQ's	2.7%	Citizens	4.0%
EPA Regions	3.1%	UST O/O	10.0%
Federal Agencies	2.0%	Used Oil Handlers	1.2%
Local Agencies	1.5%	Others	3.0%

RCRA

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261.2 Solid Waste		G-Closure/Post-Closure	112
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261.3 Hazardous Waste		I-Containers	42
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261-D Listed HW	497	L-Waste Piles	14
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261.5 Small Quantity		N-Landfills	78
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266-D HW Burned for		R-Underground Injection	8
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266-E Used Oil Burned for		Part 268-Land Disposal	
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266-G Spent Lead-Acid Battery		270 B - Permit Application	98
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261.7 Container Residues	64	F - Special Permits	29
262 Generator (Gen'l)	157	G - Interim Status	56
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263 Transporter	82	Dioxins	56
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A-Scope/Applicability	153	Referrals	838
B-General Facility Stdrds.	51	RCRA Document Requests	512
		SUBTOTAL (RCRA)	7469

CERCLA AND UST

CERCLA (as amended by SARA)

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CERCLA Document Requests	177
SUBTOTAL (CERCLA)	1821

UST Program

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Other Provisions	283
UST Document Requests	759
SUBTOTAL (UST)	1753

IV. PUBLICATIONS

RCRA PROGRAM

The following documents have been sent to the National Technical Information Service (NTIS). NTIS is located in Springfield, VA. Their phone number is (703) 487-4860.

"Alternate Concentration Limits (ACLs) Guidance Based on Criteria" 264.94(b) - Part II: Case Studies E & F (Draft), June 1986.

"Regional Guidance Manual for Selected Interim Status Requirements" (Draft) September 22, 1980. The publication number is PB-87-194-130. The cost for a paper copy is \$24.90, microfiche is \$6.50.

"Procedural Guidance for Reviewing Exposure Information under RCRA Section 3019" (Final), September 26, 1986.

"RCRA Ground-Water Monitoring Compliance Order Guidance" (Final), August 1985. The number is PB-87-193-710. The cost is \$18.95.

"RCRA Personnel Training Guidance Manual for Owners or Operators of Hazardous Waste Management Facilities" (Draft), September 1980.

"Guidance for Implementing the RCRA Dioxin Listing Rule," August 1985.

"Final Draft Guidance for Subpart G of the Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" (Final), November 1981. The number is PB-87-193-397. The cost is \$24.95.

"Facilities Storing or Treating Hazardous Waste in Tanks: A Technical Resource Document for Permit Writers" (Draft), November 1982. The number is PB-87-139-355. The cost is \$18.95.

"Model Permit for Hazardous Waste Treatment, Storage, and Disposal Facilities," April 2, 1984. The number is PB-87-193-389. The cost is \$11.95.

"Alternate Concentration Limit Guidance Based on Section 264.94(b) Criteria - Part I: Information Required in ACL Demonstrations" (Draft), June 1985.

"A Guide for Preparing RCRA Permit Applications for Existing Storage Facilities", 1982.

RCRA Publications (Continued)

"Hazardous Waste Incineration Permitting Study" (Final), August 1986.

"Procedures for Modeling Flow Through Clay Liners to Determine Required Liner Thickness" (EPA/530-SW-84-001). The publication number is PB-87-191-029. The cost is \$18.95 for paper and \$6.50 for microfiche.

"Background Document on Proposed Liner and Leak Detection Rule" (EPA/530-SW-87-015). The number is PB-87-191-385. The cost is \$42.95 for paper and \$6.50 for microfiche.

"The Hydrologic Evaluation of Landfill Performance (HELP) Model" (Volume I - User's Guide - EPA/530-SW-84-009; Volume II - Documentation - EPA/530-SW-84-010). The numbers are PB-85-100-840 for Volume I and PB-85-100-832 for Volume II.

"Guidance on Issuing Permits to Facilities Required to Analyze Groundwater for Appendix VIII Constituents." The number is PB-87-188-082.

"Guidance for Facility Management Planning" (Draft). The number is PB-87-188-090.

"Use of the Water Balance Method for Predicting Leachate Generation from Solid Waste Disposal Sites." The number is PB-87-194-643. The cost is \$11.95 for paper and \$6.50 for microfiche.

Other RCRA Documents

Permit Guidance Manual on Unsaturated Zone Monitoring for Hazardous Waste Land Treatment Units," January 1986, (EPA/530-SW-86-040) is available from ORD in Cincinnati, OH. Their phone number is (513) 569-7562.

The updated "RCRA Enforcement Policy Compendium" (through August 1986) is available by calling the Hotline.

"FY 1988 Guidance: State Mining Waste Cooperative Agreements" is available by writing to: The Office of Solid Waste, WH-562A, US EPA, 401 M St. SW, Washington, DC 20460.

"Generic Quality Assurance Project Planning for the Land Disposal Restrictions Program (BDAT)" is available by calling Dave Pepson (OSW) at (202) 382-7917. It will soon be available at NTIS.

"The Domestic Sewage Study" is available by contacting Ms. Carol Swann, Industrial Technology Division, WH-552, US EPA, 401 M St. SW, Washington, DC 20460, (202) 382-7137.

RCRA Publications (Continued)

A weekly updated list of RCRA Permitted Facilities from the HWDMS Data Base is available by contacting the Hotline.

The Hazardous Waste System (US EPA, OSWER) June 1987, is available by calling the Hotline.

The memo "Drafting Consent Decrees in Hazardous Waste (Imminent Hazard) Cases" dated May 1, 1985 from Courtney Price and Jack McGraw to Regional Administrators is available from Darlene Williams (Office of Waste Programs Enforcement) at (202) 382-3002.

CERCLA PROGRAM

The memo "Role of Clean Sites, Inc. at Superfund Sites" dated April 24, 1987 from J. Winston Porter Thomas L. Adams, Jr. is available by calling the Hotline.

"Preparation for a Site Safety Plan" and "Decontamination of Response Personnel" are available by calling Elva Slage (Office of Personnel Management and Training) at (202) 382-2997.

"Guidance on Access to Superfund Sites" can be obtained from John Fleuchaus (Office of Enforcement and Compliance Monitoring) at (202) 382-3109.

V. FEDERAL REGISTER NOTICES FOR JUNE 1987

Former Notices with Open Comment Period

April 17, 1987: 52 FR 12566
(proposed UST rule)

Proposal to regulate underground storage tanks containing petroleum or hazardous substances as defined by CERCLA (except hazardous wastes regulated under Subtitle C of RCRA) as mandated by Subtitle I-§9003 of RCRA, as amended. The rule is divided into three sections as follows: 1) technical standards, 2) financial responsibility, and 3) State programs. The comment period ends on July 16, 1987.

April 17, 1987: 52 FR 12870
(guidelines for the development of toxicological profiles)

Notice describing the procedures and criteria to be used by ATSDR and EPA in developing toxicological profiles. Section 110 of SARA requires that toxicological profiles be prepared for the priority-order lists of hazardous substances. Comments must be submitted by July 16, 1987.

May 6, 1987: 52 FR 16982
(proposed rule on burning of hazardous waste in boilers and industrial furnaces)

Proposal to control emissions of toxic organic compounds, toxic metals, and hydrogen chloride from boilers and industrial furnaces burning a hazardous waste. In addition, the proposal would subject owners and operators of these devices to the general facility standards applicable to hazardous waste treatment, storage, and disposal facilities. Further, the proposal would subject hazardous waste fuel storage units at burner facilities to Part 264 permitting standards. This proposal also proposes action on two petitions from Dow Chemical Co. and the American Iron and Steel Institute. Comments will be accepted until July 20, 1987.

May 28, 1987; 52 FR 19919
(interim guidelines on NBAR)

Request for comments and announcement of interim guidelines on Non-Binding Preliminary Allocations of Responsibility (NBAR) required under SARA §122(e)(3). Comments will be accepted until July 27, 1987.

May 29, 1987: 52 FR 20218
(proposed rule - technical standards for surface impoundments, waste piles, landfills and land treatment units)

Proposed rule for liners and leak detection for certain hazardous waste land treatment, storage and disposal units under SDWA §3004, 3005 and 3015. Comments will be accepted until July 28, 1987.

May 29, 1987: 52 FR 20336
(health effects testing under TSCA to support RCRA)

Proposed rule requiring health effects testing under TSCA §4 for 73 chemicals in support of EPA's hazardous waste regulatory program under RCRA. Comments will be accepted until July 28, 1987.

June Federal Register Notices

June 3, 1987: 52 FR 20754
(comment period extension on closure of landfills, surface impoundments, and waste piles).

The extension of the public comment period for the March 19, 1987 proposed rule on the closure of landfills, surface impoundments, and waste piles. The comment period has been extended for 30 days, until June 17, 1987.

June 3, 1987: 52 FR 20914
(proposed rule on permitting mobile hazardous-waste treatment units and delisting hazardous waste)

Proposed rule on permitting procedures and other regulations to facilitate the use of mobile treatment units in the treatment of hazardous waste. Also proposed are alternative delisting procedures under which delisting can occur as part of the permitting process.

June 4, 1987: 52 FR 21010
(final rule corrections to the land disposal restrictions)

Corrections to the final rule on land disposal restrictions that appeared in the November 7, 1986 Federal Register.

June 4, 1987: 52 FR 21152
(proposed rule on toxic chemical release reporting; community right-to-know)

Proposed rule which publishes the uniform toxic chemical release reporting form as required by §313 of Title III of SARA.

June 5, 1987: 52 FR 21306
(technical corrections to the solid waste definition)

Two technical corrections to the definition of solid waste rulemaking on January 4, 1985 to Sections 261 and 266.

June 10, 1987: 52 FR 22244
(technical assistance
grants per CERCLA §117(e))

Advance Notice of Proposed rule making
for Technical Assistance Grants for
groups of individuals which may be
affected by releases from facilities
listed on the National Priorities
List, pursuant to CERCLA §117(e).
Comments will be accepted until July 27,
1987.

June 11, 1987: 52 FR 22356
(request for comments on
proposed California waste
rule)

Request for comments on the proposed
land disposal restrictions for
California list wastes under RCRA §3004(d).
Comments were accepted through June 22,
1987.

June 11, 1987: 52 FR 22380
(technical resource
documents on construction
quality assurance and
adsorption procedures)

Notice of availability of Construction
Quality Assurance for Hazardous Waste
Land Disposal Facilities and a draft
technical resource document on Batch-
type Adsorption Procedures for Esti-
mating Soil Attenuation of Chemicals.
Comments will be accepted on the draft
technical resource document until August
15, 1987.

June 12, 1987: 52 FR 22443
(TN authorization for mixed
waste)

Notice of final authorization of
Tennessee's Hazardous Waste Management
Program revision for the hazardous com-
ponents of radioactive mixed wastes.
Comments were accepted through June 30,
1987.

June 12, 1987: 52 FR 22454
(response to comments on
Natural Resource Damage
Assessments rule)

Response to comments on CERCLA §301
damage determination rule for
Natural Resource Damage Assessments
found in 43 CFR 11.

June 12, 1987: 52 FR 22525
(automated and expert
systems workshop)

Announcement of Workshop on "Automated
and Expert Systems in Hazardous Waste
Management" to be held June 16-18,
1987, at the Breidenbach Environmental
Research Center in Cincinnati, Ohio.

June 12, 1987: 52 FR 22525
(SITE program cooperative
agreements)

Notice of EPA's intent to enter into
cooperative agreements with developers
of hazardous waste treatment technologies
under the Superfund Innovative Technology
Evaluation (SITE) program.

June 22, 1987: 52 FR 23447
(corrective action and
permitting)

Final rule allowing the o/o of a RCRA
TSDF to conduct certain corrective
action activities after issuance of
a permit at the Regional Administrator's
discretion.

June 22, 1987: 52 FR 23477
(response to domestic
sewage study comments)

Response to comments on advance notice
of proposed rulemaking which outlined
the Agency's approach to the recommen-
dations of the Domestic Sewage Study.
Comments will be accepted but are not
being formally solicited at this time.

June 24, 1987: 52 FR 23695
(containerized hazardous
liquids)

Notice requesting comments on specific
technical aspects of the December 24, 1986
(51 FR 46824) proposed requirements for
managing containerized liquid hazardous
waste. Comments will be accepted until
July 24, 1987.

June 29, 1987: 52 FR 24181
(comment period extension
on TCLP applicability)

Notice extending the comment period for
the May 18, 1987 supplemental notice to
the proposed Toxicity Characteristic
Leaching Procedure (52 FR 18583). The
supplemental notice requested comments
on the applicability of the TCLP to
wastes likely to be managed in surface
impoundments. Comments will be accepted
until August 16, 1987.

June 30, 1987: 52 FR 24333
(Science Advisory Board
meeting)

Notice of a Science Advisory Board meeting
on July 21 and 22, 1987 at US EPA head-
quarters. One of the issues to be discussed
is the Board's review of scientific
issues related to municipal waste combustion.

June 30, 1987: 52 FR 24333
("Interim Guidance on
Settlements with DeMinimus
Waste Contributors")

Notice and request for comments regarding
EPA's Interim Guidance on Settlements with
DeMinimus Waste Contributors under §122(g)
of SARA. Comments will be accepted until
August 31, 1987.

Martha Anderson, DORM
 Frank Biros, WH-527
 George Bonina, WH-563
 John Bosky, EPA-Kansas City, KS
 Susan Bronn, WH-563
 Karen Brown, PM-220
 Diane Buxbaum, Region II
 Richard Clarizio, Region V
 Eileen Claussen, WH-562
 Kathy Collier, RTP, NC
 Peter Cook, WH-527
 Alan Corson, WH-565
 Elizabeth Cotsworth, WH-563
 Wayne Crane, PM-273F
 John Creech, RTP, NC
 Hans Crump, WH-548B
 Elaine Davies, WH-562
 Truett DeGeare, WH-563
 Jeff Denit, WH-562
 Melinda Downing, DOE
 David Doyle, Region VII
 Tim Fields, WH-548B
 Lisa Friedman, LE-132S
 George Garland, WH-563
 John Gilbert, EPA-Cin., OH
 Iantha Gilmore, WH-562
 Lloyd Guerici, WH-527
 Peter Guerrero, WH-563
 Matt Hale, WH-563
 Bill Hanson, WH-548E
 Deborah Hartman, WH-527
 Steve Heare, WH-527
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 Warren Hull, A-104
 Phil Jalbert, WH-548D
 Alvin K. Joe, Jr., Geo/Resource
 Gary Jones, WH-562B

Jim Jowett, WH-548B
 Thad Juszczak, WH-562A
 Robert Knox, WH-562
 Jack Kooyomjian, WH-548B
 Mike Kosakowski, WH-527
 Jerry Kotas, WH-527-527
 Walter Kovalick, WH-548
 Tapio Kuusinen, PM-223
 Steve Leifer, LE-134S
 Steve Levy, WH-565
 Henry Longest, WH-548
 Gene Lucero, WH-527
 James Makris, WH-562A
 Eric Males, A-101F
 Jack McGraw, WH-562A
 Thea McManus, WH-562
 Scott McPhilamy, Region III
 Sue Moreland, (ASTSWMO)
 Royal Nadeau, Region II
 Sam Napolitano, PM-220
 Jim O'Leary, WH-562
 Donna Perla, WH-562
 Mike Petruska, WH-562B
 J. Winston Porter, WH-562A
 Brigid Rapp, PM-211A
 John Riley, WH-548B
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